217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Allied Tube and Conduit Corporation
Attn: James C. Skalon, Senior Environmental Engineer
16100 South Lathrop Avenue
Harvey, Illinois 60426

Application No.: 06030067 I.D. No.: 031111ABD
Applicant's Designation: Date Received: March 22, 2006
Subject: Flo-Form Line
Date Issued:
Location: 16100 South Lathrop Avenue, Harvey

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a Floform Mill, including galvanizing, coating, acid cleaning and zinc stripping as described in the above referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

1. Description

Allied Tube and Conduit Corporation is proposing to add a process line, Floform Mill, which will manufacture galvanized angular product, such as structural steel members for architectural use. Emissions from the proposed mill include particulate and mists from acid cleaning, volatile organic matter(VOM) from the application of water-based coating, and combustion products from the natural gas burners used to heat the galvanizer. The particulate mists from the acid cleaning cells will be controlled with a wet scrubber.

2. Emission Units and Pollution Control Equipment

Emission Unit	Description	Control Equipment
FloForm Line	Acid Cleaning of Metal Parts	Scrubber
	Galvanizing	----
	Coating and End Spray	----
	Zinc Pump Strip	Scrubber

3. Applicability Provisions

a. The "affected floform line" for the purpose of this permit is the Floform Mill and associated equipment including galvanizing, coating, acid cleaning and zinc striping, as described in Conditions 1 and 2 unless otherwise stated in the following conditions.

b. The affected floform line is subject to 40 CFR 63 Subpart MMMM, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coatings of Miscellaneous Metal Parts and Products, and shall comply with all applicable requirements of the NESHAP on or before the effective date of this subpart.

c. The affected floform line is subject to 35 IAC 218.204(j), which provides that no person shall apply at any time any coating in which the VOM content exceeds the following limits, expressed in lb/gal(minus water and any compounds which are specifically exempted form the definitions of VOM):

Clear coating: 4.3 lb/gal
Extreme performance coating: 3.5 lb/gal
Other coating, air dried: 3.5 lb/gal
Other coating, baked: 3.0 lb/gal

d. The affected floform line is subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in of 35 IAC 212.321(a).

e. The affected floform line is subject to 35 IAC 212.123, which provides that no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

f. The affected floform line is subject to 35 IAC 214.301, which provides that no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

4. Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected floform line not constituting a major modification subject to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) or 35 IAC Part 203 Major Stationary Sources Construction and Modification (MSSCAM). The Permittee has addressed the applicability of PSD and MSSCAM, demonstrating that the modification will not result in a significant increase in emissions, subject to the limitations in Conditions 5 and 6. (See Condition 6(c) and Attachment 1.)

5. Operational and Production Limitations

a. i. The total amount of VOM contained in coating and other VOM containing materials used in the affected floform line shall not exceed 3.9 tons/month and 38.85 tons/year.

ii. Natural gas shall be the only fuel used by the affected floform line.

b. The scrubber shall be operated at all times that the associated emission unit is in operation.

c. At all times, the Permittee shall, to the extent practicable, maintain and operate the affected floform line, including associated equipment, in a manner consistent with good air pollution control practice for minimizing emissions.

6. Emission Limitations

a. Emissions from the affected floform line and associated equipment shall not exceed the following limits:

Pollutant	(Tons/Month)	(Tons/Year)
VOM	3.90	38.85
NO_x	0.08	0.75
CO	0.07	0.71

These limits are based on the maximum coating usage information supplied in the permit application. Actual amounts and formulations of coatings may vary, however actual emissions shall not exceed these limits.

b. This permit is issued based on negligible emissions of particulate matter (PM), sulfur dioxide (SO_2) and hydrogen chloride from the affected line. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

c. This permit is issued based on a reduction in plant-wide VOM emissions from solvent cleaning. For this purpose, beginning upon initial startup of the affected floform line, cleaning emissions shall not exceed 1.3 tons/month and 13 tons/year. See Attachment 1

d. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7. Testing Requirements

a. The affected floform line is subject to 40 CFR 63 Subpart MMMM, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coatings of Miscellaneous Metal Parts and Products, and shall comply with all applicable testing requirements of the NESHAP on or before the effective date of this subpart.

b. The VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105.

c. Upon request by the Illinois EPA, the Permittee shall have PM and HCL emissions from stacks from the affected floform line measured at its expense by an approved testing service, during conditions representative of maximum operation using approved USEPA test methods and procedures.

8. Instrumental Requirements

The Permittee shall measure and record the pressure drop across each scrubber, in inches of water at least once per shift.

9. Recordkeeping Requirements

a. The affected floform line is subject to 40 CFR 63 Subpart MMMM, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coatings of Miscellaneous Metal Parts and Products, and shall comply with all recordkeeping requirements of the NESHAP on or before the effective date of this subpart.

b. Upon initial startup of the affected floform line the Permittee shall certify to the Illinois EPA that the affected line is in compliance with the VOM content limits, certification shall include:

i. The name and identification number of each coating as applied on each coating line; and

ii. The weight of VOM per volume of each coating(minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.

c. The Permittee shall maintain the following operating records for the affected floform line:

i. Natural gas usage for the line(MMSCF/month and MMSCF/year).

ii. Amount and type of each coating used(gallons/month And gallons/year).

iii. VOM and HAP content of each coating used, minus water, with supporting documentation.

iv. HCL usage (lbs/month and lbs/year).

d. Logs for scrubbed units.

i. Operation

ii. Maintenance and repair

e. Operating records for cleaning solvent.

f. The Permittee shall maintain the following records related to emissions of the affected floform line and cleaning operations at the source.

i. A file containing the CO, NO_x, and HCL emission factors for the affected floform line used by the Permittee to calculate emissions, with supporting documentation.

ii. Emissions of: NO_x, VOM, CO and HCL from the affected floform line(tons/month and tons/year) with supporting calculations.

iii. VOM emissions from solvent cleaning operations at the source (tons/month and tons/year).

10. Reporting Requirements

a. The Permittee shall notify the Illinois EPA, Compliance Section of any record showing violation of applicable regulations by submitting a copy of such record within 30 days following the occurrence of the violation. [35 IAC 218.211(c)(3)(a)]

b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of any deviations of the affected floform line with the permit requirements. These reports shall be submitted within 30 days of the exceedance and shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

11. Two copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

12. The Permittee is allowed to operate the affected floform line under this construction permit until final action is taken to incorporate it in a revision to or renewal of their CAAPP permit.

If you have any questions on this permit, please call Kevin Smith at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:KLS:psj

cc: Region 1

Attachment 1

PSD Applicability

Table I – VOM Emissions From Solvent Cleaning
Tons/Year

Past Actual*	21.21
Future Potential	13.00
Net Decrease	8.21

* Based on 2002-2003 two year average

Table II – Contemporaneous Emissions Increases

Emission Unit	**VOM**
Floform Line	38.85
Boiler #1 and #2	0.25
Aerosol Can	7.93
Total	47.03

Table III – Net VOM Emissions Change (Tons/Year)

Table I	-8.21
Table II	47.03
Total	38.82

KLS:psj